

**EXHIBIT 1 TO ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 7
BAYOU STEEL BD HOLDINGS, LLC, <i>et al.</i> , <sup>1</sup>	Case No. 19-12153 (KBO)
Debtors.	(Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> ,	Adv. Proc. No. 21-50221 (KBO)
Plaintiff,	
vs.	
R&R EXPRESS, INC.,	
Defendant.	

**STIPULATION REGARDING APPOINTMENT OF MEDIATOR**

---

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the “Plaintiff”), for the estates of the above-captioned debtors (the “Debtors”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), by and through his undersigned counsel and defendant R&R Express, Inc. on (the “Defendant,” and together with Plaintiff, the “Parties”), enter into this *Stipulation Regarding Appointment of Mediator* (the “Stipulation”) and hereby stipulate and agree as follows:

1. Connor Bifferato, Esq. shall be appointed as the mediator (the “Mediator”) in this adversary proceeding.
2. The mediation shall be conducted in accordance with the Local Rules of

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and/or otherwise as may be agreed by the Parties and the Mediator. The Parties will select a date for commencement of the mediation.

Dated: August 16, 2021

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Peter J. Keane*

---

Bradford J. Sandler (DE Bar No. 4142)  
Andrew W. Caine (CA Bar No. 110345)  
Peter J. Keane (DE Bar No. 5503)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: bsandler@pszjlaw.com  
acaine@pszjlaw.com  
pkeane@pszjlaw.com

*Counsel to Plaintiff George L. Miller,  
Chapter 7 Trustee*

and

LAW OFFICE OF CURTIS A. HEHN

*/s/ Curtis A. Hehn*

---

Curtis A. Hehn (Bar No. 4264)  
1007 N. Orange St., 4th Floor  
Wilmington, DE 19801  
Telephone: (302) 757-3491  
Fax: (302) 295-4801  
Email: curtishehn@comcast.net

*Counsel to Defendant*